

# **EXHIBIT 120**

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1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4 Case No. 18-cv-01047 (PGG)

5 - - - - -x  
6 EIG ENERGY FUND XIV, L.P.,  
EIG ENERGY FUND XIV-A, L.P.,  
7 EIG ENERGY FUND XIV-B, L.P.,  
EIG ENERGY FUND XIV (CAYMAN), L.P.,  
8 EIG ENERGY FUND XV, L.P.,  
EIG ENERGY FUND XV-A, L.P.  
9 EIG ENERGY FUND XV-B, L.P.  
EIG ENERGY FUND XV (CAYMAN), L.P.

10 Plaintiffs,

-against-

11 KEPPEL OFFSHORE & MARINE LTD.,  
Defendant.

12 - - - - -x  
13 Virtual Zoom Deposition  
14

June 30, 2021

15 6:00 p.m.

16 CONFIDENTIAL VIRTUAL VIDEO DEPOSITION  
17 of KENNETH CHONG, in the above-entitled  
18 action, held at the above time and place,  
19 taken before Jeremy Richman, a Shorthand  
20 Reporter and Notary Public of the State of  
21 New York, pursuant to the Federal Rules of  
22 Civil Procedure, and stipulations between  
23 Counsel.

24  
25 \* \* \*

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2 Q. Do you know what title you 18:18:46

3 held during that period of time? 18:18:47

4 A. I think between 2009 and 2015 18:18:48

5 before, yeah, until 2015 I was the 18:18:54

6 assistant general manager. 18:18:57

7 Q. Okay. And then in June 2015, 18:18:59

8 your title changed to general manager 18:19:03

9 of legal; is that correct, sir? 18:19:06

10 A. That's correct. 18:19:08

11 Q. And do you currently hold 18:19:09

12 that title? 18:19:12

13 A. Yes. 18:19:12

14 Q. Okay. Do you also hold a 18:19:12

15 title of corporate secretary? 18:19:15

16 A. For Keppel Offshore & Marine 18:19:21

17 or -- 18:19:23

18 Q. Correct. 18:19:25

19 A. Yes. 18:19:25

20 Q. Company secretary? 18:19:26

21 A. Secretary, yes. 18:19:29

22 Q. I want to start, when you 18:19:30

23 first joined Keppel in January 2001, 18:19:34

24 what were your duties and 18:19:40

25 responsibilities as senior legal 18:19:41

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2 officer? 18:19:43

3 A. Well, mainly providing legal 18:19:43  
4 advice, and to the extent that I was 18:19:52  
5 appointed secretary of some of the 18:20:00  
6 companies, then as a secretary. But 18:20:03  
7 otherwise mainly providing in-house 18:20:09  
8 legal advice. 18:20:14

9 Q. And did your duties and 18:20:14  
10 responsibilities change when you had 18:20:15  
11 title changes? 18:20:17

12 A. Actually, no. 18:20:18

13 Q. So from the time you joined 18:20:20  
14 Keppel through the present, your 18:20:27  
15 primary job responsibility is to 18:20:29  
16 provide legal advice; is that correct? 18:20:33

17 A. Yes. 18:20:34

18 Q. And as part of your job 18:20:34  
19 responsibilities, do you negotiate and 18:20:36  
20 draft legal contracts? 18:20:40

21 A. Yes. 18:20:43

22 Q. And who did you report to 18:20:43  
23 when you first joined Keppel in 18:20:47  
24 January 2001? 18:20:50

25 A. Jeff Chow. 18:20:54

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2 Q. And did you continue to 18:20:59  
3 report to Mr. Chow until he departed 18:21:01  
4 from the company? 18:21:06

5 A. Yes. 18:21:07

6 Q. And were there individuals 18:21:07  
7 who reported to you between the time 18:21:09  
8 period of 2001 through the present at 18:21:11  
9 Keppel? 18:21:13

10 A. In strict formal lines, I 18:21:21  
11 think they were quite flat, so strictly 18:21:24  
12 speaking, formally speaking, no. 18:21:27

13 Q. Between the period January 1, 18:21:34  
14 2010, through the end of 2015, who were 18:21:41  
15 the other employees besides you and 18:21:46  
16 Mr. Chow that worked in the legal 18:21:49  
17 department at Keppel? 18:21:52

18 A. There are quite a number, 18:21:53  
19 because there are people that came and 18:21:57  
20 went. So do you want me to name them? 18:21:58

21 Q. I would like you to name the 18:22:00  
22 people you recall, yes. 18:22:03

23 A. The people I work with, 18:22:03  
24 basically, yes, legal officers or legal 18:22:05  
25 counsel. Is that correct? 18:22:07

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2 contract of employment, I recalled that 18:28:57  
3 the company that I signed the contract 18:28:58  
4 with was Keppel FELS. But of course, 18:29:01  
5 with the designations and duties, it's 18:29:07  
6 for Keppel Offshore & Marine. 18:29:09

7 Q. And is Keppel Corporation the 18:29:11  
8 parent company of Keppel Offshore & 18:29:15  
9 Marine? 18:29:17

10 A. Yes. 18:29:17

11 Q. And KOM, as we agreed to call 18:29:21  
12 it, is a hundred percent owned by 18:29:26  
13 Keppel Corp., correct? 18:29:28

14 A. Yes. 18:29:30

15 Q. KOM has several wholly owned 18:29:34  
16 subsidiaries as well, correct? 18:29:39

17 A. Yes. 18:29:40

18 Q. KOM owns a hundred percent of 18:29:41  
19 Keppel FELS Limited, correct? 18:29:45

20 A. Yes. 18:29:48

21 MR. KUMAGAI: Object to form. 18:29:48

22 MS. LAW: What's your 18:29:53  
23 objection, Dave? 18:29:53

24 MR. KUMAGAI: He can't speak 18:29:55  
25 on behalf of KOM what their 18:29:58

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1	CONFIDENTIAL - CHONG	
2	A. It does not directly own	18:31:04
3	Keppel FELS Brasil.	18:31:06
4	Q. Does it indirectly own Keppel	18:31:08
5	FELS Brasil?	18:31:13
6	A. Yes.	18:31:13
7	Q. How so?	18:31:13
8	A. Through shareholding in other	18:31:14
9	companies.	18:31:18
10	Q. Is Fernvale Pte., Ltd. a	18:31:19
11	wholly owned subsidiary of KOM?	18:31:27
12	A. Yes.	18:31:29
13	Q. Have you ever heard of a	18:31:39
14	gentleman named Zwi Skornicki?	18:31:41
15	A. Yes.	18:31:46
16	Q. And did Mr. Skornicki have a	18:31:46
17	relationship with Keppel?	18:31:52
18	A. I believe so, yes.	18:31:52
19	Q. What is your understanding of	18:31:56
20	what that relationship was?	18:31:57
21	A. As far as I know, he's an	18:31:58
22	agent of some other company.	18:32:02
23	Q. Is he -- was he ever an agent	18:32:06
24	of KOM?	18:32:09
25	A. I don't think so.	18:32:10

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1	CONFIDENTIAL - CHONG	
2	Q. Was he an agent of Fernvale?	18:32:19
3	A. I think so.	18:32:24
4	Q. Do you know what	18:32:26
5	Keppel-related entities he served as an	18:32:34
6	agent for other than Fernvale?	18:32:35
7	A. I cannot really recall.	18:32:44
8	Q. Have you ever heard of an	18:32:47
9	entity called Deep Sea Oil?	18:32:48
10	A. I cannot really remember.	18:32:51
11	Q. Have you ever heard of an	18:33:02
12	entity called Eagle do, D-O, Brasil?	18:33:03
13	A. Yes.	18:33:09
14	Q. And what is your	18:33:10
15	understanding of what Eagle do Brasil	18:33:12
16	is?	18:33:22
17	A. I think it's a company that's	18:33:23
18	related to Wi.	18:33:24
19	Q. Mr. Chong, when was the first	18:33:35
20	time that you heard of an entity called	18:33:42
21	Sete Brasil?	18:33:45
22	A. I don't recall exactly, but	18:33:46
23	probably around early 2010s, 2011	18:34:00
24	maybe.	18:34:06
25	Q. 2010, 2011?	18:34:06



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2 A. Yes. 21:21:13

3 Q. Okay. If you look at the 21:21:13  
4 bottom email, I will represent you're 21:21:18  
5 not on that, but it's forwarded to you 21:21:24  
6 in the top chain. It's an email from 21:21:26  
7 Tan Leong, L-E-O-N-G, Peng, P-E-N-G, to 21:21:31  
8 Aziz Amirali, A-M-I-R-A-L-I, Merchant, 21:21:42  
9 and others, and Mr. Tan Leong Peng 21:21:47  
10 says, Dear bosses, we have successfully 21:21:47  
11 signed the LOI for Sete Brasil this 21:21:52  
12 afternoon at 1:30 p.m. for the 21:21:56  
13 construction of the remaining five 21:21:58  
14 numbers of DSS38E semi. Do you see 21:22:01  
15 that, sir? 21:22:04

16 A. Yes. 21:22:04

17 Q. And do you recall that Keppel 21:22:04  
18 was awarded five additional contracts 21:22:07  
19 after the December 11th contract? 21:22:10

20 A. Yes. 21:22:11

21 Q. In the top email on the chain 21:22:11  
22 to Tommy Sam and you from Kai Choong 21:22:19  
23 Kwok, K-A-I, C-H-O-O-N-G, K-W-O-K, from 21:22:24  
24 March 23, 2011, it says, Kenneth, we 21:22:31  
25 just finished the dinner with Barusco, 21:22:35

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2 Q. Who is Aziz? 22:16:32

3 A. I presume it's referring to 22:16:33  
4 Aziz Merchant. 22:16:34

5 Q. What was Mr. Merchant's role 22:16:35  
6 within Keppel? 22:16:38

7 A. He was the director of 22:16:43  
8 Fernvale, if I recall correctly. 22:16:48

9 Q. Director of Fernvale? 22:16:49

10 A. Yeah. 22:16:51

11 Q. And Fernvale was the entity 22:16:51  
12 that entered into the agreements with 22:16:53  
13 Mr. Skornicki's companies, correct? 22:16:55

14 A. We have talked about that 22:16:58  
15 earlier, yes. 22:17:05

16 Q. The answer is yes, right, 22:17:12  
17 Mr. Chong? 22:17:14

18 A. Yes. 22:17:15

19 Q. Okay. He said, There is an 22:17:15  
20 envelope on my desk with the agency 22:17:18  
21 agreement. 22:17:20

22 Do you know why the documents 22:17:23  
23 were in an envelope -- 22:17:27

24 A. I wouldn't know. 22:17:28

25 Q. Okay. Okay. If you go to 22:17:29

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1	CONFIDENTIAL - CHONG	
2	me.	22:29:10
3	Q. Bear with me one second,	22:29:10
4	Mr. Chong.	22:29:12
5	(Exhibit 51, marked for	22:29:13
6	identification, Bates stamped	22:29:13
7	KEPPEL00610466.)	22:30:33
8	Q. Mr. Chong, can you look at	22:30:33
9	what I introduced as Exhibit 51,	22:30:35
10	please.	22:30:38
11	A. Yes.	22:30:38
12	Q. This is a document Bates	22:30:38
13	stamped Keppel 00610466 through 558.	22:30:40
14	Is this one of the engineering --	22:30:53
15	withdrawn.	22:30:53
16	Is this one of the EPC	22:30:56
17	contracts that was executed for the	22:30:58
18	five additional rigs in connection with	22:31:00
19	the Sete transaction?	22:31:06
20	A. I need to scroll through it.	22:31:07
21	Yes.	22:31:31
22	Q. And if you look at the first	22:31:31
23	page, it's an EPC contract dated	22:31:33
24	August 2, 2012, correct?	22:31:37
25	A. Yes.	22:31:37

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2 Q. And it's between Frade 22:31:37

3 Drilling and Fernvale PTE, correct? 22:31:41

4 A. Yes. 22:31:45

5 Q. And if you look at the last 22:31:45

6 page of the document, which is 93 of 22:31:53

7 the document, it says, Witnesses. Do 22:31:57

8 you see that, sir? 22:32:03

9 A. Yes. 22:32:05

10 Q. And it says, Name, and it 22:32:05

11 says, Kenneth Chong? 22:32:09

12 A. Yes. 22:32:10

13 Q. And you signed that, correct? 22:32:11

14 A. Yes. 22:32:15

15 Q. And identity, can you read to 22:32:17

16 me what it says under identity? 22:32:19

17 A. AGM legal KOM. 22:32:20

18 Q. What does AGM stand for? 22:32:23

19 A. Assistant general manager. 22:32:26

20 Q. And is that your signature on 22:32:28

21 this document? 22:32:31

22 A. Yes. 22:32:31

23 Q. And if you go to page 10 of 22:32:31

24 the document, tell me when you're 22:32:44

25 there. 22:32:45

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1	CONFIDENTIAL - CHONG	
2	A. Page 10.	22:32:55
3	Q. Page 10. The first full page	22:32:56
4	of the agreement, do you see that Frade	22:32:58
5	Drilling is defined as owner?	22:33:00
6	A. Yes.	22:33:01
7	Q. And do you see that Fernvale	22:33:01
8	is defined as contractor?	22:33:05
9	A. Yes.	22:33:07
10	Q. And if you turn to page 42 of	22:33:07
11	the agreement.	22:33:14
12	A. Forty-two?	22:33:21
13	Q. Correct.	22:33:23
14	A. Okay, yes.	22:33:25
15	Q. Paragraph 6.2 contains the	22:33:26
16	representations and warranties of the	22:33:32
17	contractor, which is Fernvale, correct?	22:33:34
18	A. Yes.	22:33:36
19	Q. Okay. And under subparagraph	22:33:37
20	B it says, No violation of law,	22:33:40
21	litigation, correct?	22:33:43
22	A. Yes.	22:33:44
23	Q. And that's the same provision	22:33:44
24	we saw in the earlier EPC contract that	22:33:47
25	we looked at, correct?	22:33:49

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2 A. Yes. 22:33:51

3 Q. Okay. And when you were a 22:33:51

4 witness signing this agreement on 22:33:55

5 behalf of Fernvale, did you understand 22:33:58

6 that what was contained in six point -- 22:34:04

7 the representation -- withdrawn. 22:34:09

8 When you were a witness who 22:34:10

9 signed this document on behalf of a 22:34:12

10 Keppel entity, did you have any 22:34:15

11 understanding that the representation 22:34:17

12 contained in paragraph 6.2B was false? 22:34:21

13 A. No. 22:34:25

14 Q. At the time that you signed 22:34:29

15 this agreement on behalf of Keppel -- 22:34:32

16 A. I didn't sign on behalf of 22:34:34

17 Keppel. 22:34:36

18 Q. Withdrawn. At the time -- 22:34:36

19 MR. KUMAGAI: Let her ask the 22:34:38

20 question. 22:34:39

21 Q. At the time that you were a 22:34:40

22 witness for a Keppel entity for this 22:34:42

23 agreement, did you have any concerns 22:34:46

24 that the representation contained in 22:34:50

25 paragraph 6.2B was false? 22:34:52

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2 A. No. 22:34:55

3 Q. At the time that you were a 22:34:57

4 witness for a Keppel entity in 22:35:01

5 connection with this document, did you 22:35:03

6 do any investigation to -- let me start 22:35:05

7 again. 22:35:23

8 At the time that you were a 22:35:24

9 witness for a Keppel entity in 22:35:24

10 connection with this document, did you 22:35:26

11 do any investigation personally to 22:35:28

12 ensure that the representation 22:35:32

13 contained in paragraph 6.2B was true? 22:35:34

14 A. No. 22:35:38

15 Q. Can you please turn to 22:35:39

16 Exhibit 52. Tell me when you have that 22:35:45

17 open, sir. 22:35:50

18 (Exhibit 52, marked for 22:35:51

19 identification, Bates stamped 22:35:51

20 KEPPEL00610382.) 22:35:55

21 MR. KUMAGAI: Do we need to 22:35:55

22 do the same thing for all the other 22:35:56

23 four? 22:35:58

24 MS. LAW: Yes. I can 22:35:59

25 short-circuit it, if you'll let me. 22:36:00

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2 MR. KUMAGAI: How do you want 22:36:03

3 to do that? 22:36:05

4 MS. LAW: I could ask him to 22:36:07

5 look at Exhibit 52, 53, 54 and 55, 22:36:09

6 confirm he was a witness on all, 22:36:19

7 confirm these are four contracts 22:36:22

8 related to Sete, confirm there was 22:36:24

9 the same representation as in the 22:36:25

10 document he signed, and if I asked 22:36:27

11 him the same three questions, if he 22:36:29

12 would answer the same way. If 22:36:31

13 you're comfortable with that, I'm 22:36:35

14 happy to do it that way. 22:36:37

15 MR. KUMAGAI: I mean, I don't 22:36:38

16 really get the point. We can 22:36:39

17 stipulate to that. Go through it 22:36:40

18 quickly, if you want. 22:36:49

19 MS. LAW: Okay. 22:36:51

20 Q. Can you turn to Exhibit 52, 22:36:51

21 please. 22:36:53

22 A. Okay. 22:36:58

23 Q. This is an EPC contract dated 22:36:58

24 August 2, 2012, correct? 22:37:00

25 A. Yes. 22:37:02



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2 Q. It's between Bracuhy Drilling 22:37:03

3 and Fernvale, correct? 22:37:13

4 A. Yes. 22:37:14

5 Q. You were a witness to this 22:37:15

6 agreement as well, correct? 22:37:19

7 A. Yes. 22:37:20

8 Q. There is also a 22:37:21

9 representation 6.2 by the contractor in 22:37:25

10 this EPC contract, correct? 22:37:29

11 A. Yes. 22:37:32

12 Q. And the contractor here is a 22:37:35

13 Keppel entity, correct? 22:37:37

14 A. Yes. 22:37:38

15 Q. And the -- one of the 22:37:39

16 representations in 6.2B on page 42 of 22:37:41

17 this agreement is the same no violation 22:37:46

18 of law provision that we saw in the 22:37:49

19 earlier contract, correct? 22:37:52

20 A. Yes. 22:37:53

21 Q. And did you know that this 22:37:53

22 representation was false at the time 22:37:57

23 that you executed -- withdrawn. 22:37:58

24 Did you know that this 22:38:01

25 representation was false at the time 22:38:02

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2 you witnessed the signing of this 22:38:03

3 agreement? 22:38:05

4 A. No. 22:38:06

5 Q. Did you do any investigation 22:38:06

6 at this time to verify the truth of the 22:38:16

7 representation? 22:38:19

8 A. No. 22:38:20

9 Q. Okay. Can you turn to 22:38:21

10 Exhibit 53, please. Tell me when you 22:38:24

11 have that open. 22:38:33

12 (Exhibit 53, marked for 22:38:26

13 identification, Bates stamped 22:38:26

14 KEPPEL00610654.) 22:38:47

15 A. Yes, it's open. 22:38:47

16 Q. This is an EPC contract dated 22:38:48

17 August 2, 2012, between Portugalo 22:38:51

18 Drilling and Fernvale, correct? 22:38:55

19 A. Yes. 22:38:59

20 Q. And this is another EPC 22:38:59

21 contract relating to the Sete rigs, 22:39:02

22 correct? 22:39:05

23 A. Yes. 22:39:06

24 Q. And you were a witness to the 22:39:07

25 execution of this agreement as well, 22:39:10

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1	CONFIDENTIAL - CHONG	
2	correct?	22:39:12
3	A. Yes.	22:39:12
4	Q. And this EPC contract also	22:39:13
5	contains representations and warranties	22:39:20
6	of the owner, correct?	22:39:22
7	A. Yes.	22:39:23
8	Q. And it contains	22:39:25
9	representations and warranties of the	22:39:26
10	contractor, correct?	22:39:28
11	A. Yes.	22:39:28
12	Q. And the contractor was a	22:39:30
13	Keppel entity, correct?	22:39:33
14	A. Yes.	22:39:34
15	Q. And one of those	22:39:34
16	representations was that the contractor	22:39:37
17	was not engaged in any violation of	22:39:39
18	applicable law, correct?	22:39:42
19	A. Yes.	22:39:43
20	Q. Did you know that that	22:39:46
21	representation was false at the time	22:39:49
22	you witnessed the execution of this	22:39:51
23	document?	22:39:52
24	A. No.	22:39:52
25	Q. Did you do any investigation	22:39:52

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2	to assure the truth of the	22:39:54
3	representation at the time that you	22:39:58
4	were a witness?	22:40:00
5	A. No.	22:40:00
6	Q. Can you turn to Exhibit 54,	22:40:02
7	please.	22:40:06
8	(Exhibit 54, marked for	22:40:09
9	identification, Bates stamped	22:40:09
10	KEPPEL0055548.)	22:40:14
11	A. Yes, I have it.	22:40:14
12	Q. This is an EPC contract dated	22:40:15
13	August 2, 2012, between, I'm going to	22:40:21
14	spell it. It's M-A-N-G-A-R-A-T-I-B-A,	22:40:24
15	Mangaratiba Drilling, and Fernvale,	22:40:31
16	correct?	22:40:34
17	A. Yes.	22:40:34
18	Q. And this was also related to	22:40:35
19	the additional rigs that Keppel was	22:40:37
20	awarded from Sete, correct?	22:40:39
21	A. Yes.	22:40:41
22	Q. And you were a witness to the	22:40:42
23	execution of this EPC contract,	22:40:44
24	correct?	22:40:46
25	A. Yes.	22:40:47

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2 Q. And this contract similarly 22:40:48  
3 has representations that there was no 22:40:52  
4 violation of law, correct? 22:40:54

5 A. Yes. 22:40:56

6 Q. Did you know that those 22:40:56  
7 representations were false at the time 22:41:01  
8 you were a witness? 22:41:02

9 A. No. 22:41:03

10 Q. Did you do any investigation 22:41:03  
11 to verify the truth of the 22:41:07  
12 representations when you were a 22:41:08  
13 witness? 22:41:10

14 A. No. 22:41:12

15 Q. Can you turn to Exhibit 55, 22:41:13  
16 please. Tell me when you have it open. 22:41:18

17 (Exhibit 55, marked for 22:41:20  
18 identification, Bates stamped 22:41:20  
19 KEPPEL00555263.) 22:41:23

20 A. Yes, I have it open. 22:41:23

21 Q. This is an EPC contract dated 22:41:24  
22 August 2, 2012, between Botinas 22:41:27  
23 Drilling and Fernvale, correct? 22:41:32

24 A. Yes. 22:41:34

25 Q. And this, too, relates to the 22:41:35

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2	drilling rigs that Keppel was awarded	22:41:38
3	from Sete, correct?	22:41:41
4	A. Yes.	22:41:42
5	Q. You were a witness to the	22:41:43
6	execution of this EPC contract,	22:41:44
7	correct?	22:41:46
8	A. Yes.	22:41:46
9	Q. And this EPC contract	22:41:48
10	similarly contained representations of	22:41:51
11	the contractor, correct?	22:41:54
12	A. Yes.	22:41:57
13	Q. And Keppel was the	22:41:57
14	contractor, correct -- withdrawn.	22:41:59
15	A Keppel entity was the	22:42:01
16	contractor, correct?	22:42:04
17	A. Yes.	22:42:05
18	Q. And one of those	22:42:05
19	representations was that there was no	22:42:06
20	violation of law, correct?	22:42:07
21	A. Yes.	22:42:14
22	Q. Did you know that was false	22:42:14
23	at the time you witnessed the execution	22:42:16
24	of the agreement?	22:42:19
25	A. No.	22:42:19